

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,  
Plaintiffs,

vs.

COLLINS MURPHY, et al.  
Defendants.

Case No.: 7:20-cv-00947

**DECLARATION OF CONSTANTINOS CHRISTOFOROU**

Constantinos Christoforou being duly sworn, does hereby depose and state:

1. My name is Constantinos Christoforou. Unless otherwise stated, I make this affidavit of my own personal knowledge.

2. I am a Director of xHamster IP Holdings, Ltd. ("XIH"), which – in February of 2021 – changed its name to Online Media IP Holding Ltd. Because the complaint in this case references XIH, I will do the same in this declaration.

3. XIH is registered in the British Virgin Islands with its principal place of business in St. John's, Antigua.

4. XIH does not – in any way, shape, or form – own or operate the xHamster.com website.

5. XIH owns and maintains the "xHamster" trademark, which includes making the necessary regulatory filings, monitoring the use of the xHamster name, and (when necessary) bringing legal claims to protect the xHamster trademark.

6. The xHamster name is not trademarked in the United States and XIH does not own or maintain a U.S. Trademark for xHamster. Instead, the xHamster mark is protected by a



Benelux registration (covering Belgium, The Netherlands and Luxembourg); a EUIPO registration (covering the EU); a United Kingdom registration; a Brazilian registration; and an Antigua and Barbuda registration.

7. Contrary to the allegations in the complaint, XIH does not conduct business in the United States or South Carolina.

8. XIH does not now have an office in South Carolina, nor has it ever had an office in South Carolina.


9. XIH does not have an office in the United States, nor has it ever had an office in the United States.

10. XIH does not have (and has never had) any employees in South Carolina or the United States.

11. XIH does not maintain a bank account in South Carolina or the United States, nor has it ever had such an account.

12. XIH does not pay taxes in South Carolina or the United States, nor has it ever done so.

Signed under the pains and penalties of perjury this 22 day of November, 2022.



Constantinos Christoforou, Director  
xHamster IP Holdings, Ltd. (now known as  
Online Media IP Holdings, Ltd.)